

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

QVC, INC.

Plaintiff,

vs.

Q VISION NETWORK, INC.,

Defendant.

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Civil Action No. 02-CV-2874

PLAINTIFF'S MOTION FOR LEAVE TO FILE A SUPPORTING BRIEF
IN EXCESS OF TWENTY-FIVE (25) PAGES

Plaintiff, QVC, Inc., respectfully moves this Court to grant it leave to file a Memorandum of Law in Support of its Motion for Preliminary Injunction, in excess of twenty-five (25) pages.

In support hereof, Plaintiff states as follows:

1. On May 14, 2002, Plaintiff initiated the above-captioned Action for trademark infringement, trademark dilution, and unfair competition claims under the Lanham Act, 15 U.S.C. §§ 1051 et seq. and the statutory and common laws of the Commonwealth of Pennsylvania, by filing its Complaint.

2. On May 20, 2002, the Summons and Complaint were served upon Scott Singer, President and Statutory Agent for Defendant.

3. Despite attempts to amicably resolve this dispute, and having been unable to do so, Plaintiff was compelled to commence the accompanying Motion for Preliminary Injunction.

4. In order to adequately and properly address the

requirements to be met by one seeking a preliminary injunction, as well as to appropriately demonstrate the likelihood that Plaintiff will prevail on the merits of its trademark infringement, trademark dilution, and unfair competition claims under the Lanham Act, 15 U.S.C. §§ 1051 *et seq.* and the statutory and common laws of the Commonwealth of Pennsylvania, Plaintiff respectfully submits that more than twenty-five (25) pages is needed.

WHEREFORE, Plaintiff QVC, Inc. respectfully requests that the Court allow it to file the accompanying Memorandum of Law in support of its Motion for Preliminary Injunction, which measures thirty-four (34) pages in content.

Respectfully submitted,

**CAESAR, RIVISE, BERNSTEIN,
COHEN & POKOTILOV, LTD.**

Dated: June 10, 2002

By



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